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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EPIC GAMES, INC.,  
Plaintiff, Counter-defendant

v.

APPLE INC.,  
Defendant, Counterclaimant

IN RE APPLE IPHONE ANTITRUST  
LITIGATION

DONALD R. CAMERON, *et al.*,  
Plaintiffs

v.

APPLE INC.,  
Defendant.

Case No. 4:20-cv-05640-YGR-TSH  
Case No. 4:11-cv-06714-YGR-TSH  
Case No. 4:19-cv-03074-YGR-TSH

**DECLARATION OF JAY SRINIVASAN IN  
SUPPORT OF APPLE INC.'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

Hon. Yvonne Gonzalez Rogers  
Hon. Thomas S. Hixson

Pursuant to Civil Local Rule 79-5, I, Jay P. Srinivasan, hereby declare as follows:

1. I am an attorney licensed to practice in the State of California, and a member of the Bar of this Court. I am a partner at the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Apple Inc. (“Apple”) in these related cases.

2. I submit this declaration pursuant to Civil Local Rules 7-11(a) and 79-5(d)-(e) in support of Apple’s Administrative Motion to File Under Seal the Joint Discovery Letter Brief regarding Apple’s Subpoena to Non-Party Samsung Electronics America, Inc. (the “Joint Discovery Letter Brief”). The contents of this declaration are based on my personal knowledge.

3. Apple moves to seal the Joint Discovery Letter Brief and Supporting Exhibits 3-5, which contain information that Plaintiff and Counter-Defendant Epic Games, Inc. has designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the protective order entered in *Epic Games, Inc. v. Apple Inc.*, No. 20-cv-05640-YGR-TSH, ECF No. 112.

4. Apple does not agree that any information contained in the Joint Discovery Letter Brief or Exhibits 3-5 meets the standard for sealing under the Civil Local Rules, but is filing the brief and exhibits under seal as a courtesy to Epic and Samsung.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed on January 21, 2020, at Pasadena, California.

Dated: January 21, 2021

By: /s/ Jay Srinivasan  
Jay P. Srinivasan